

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
MARY K. JONES, Individually and on Behalf	:	Civil Action No. 1:10-cv-03864-AKH
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff	:	
	:	DECLARATION OF WILLOW E.
vs.	:	RADCLIFFE IN SUPPORT OF
	:	PLAINTIFFS' MOTION FOR CLASS
PFIZER INC., et al.,	:	CERTIFICATION
	:	
Defendants.	:	
<hr/>		X

I, WILLOW E. RADCLIFFE, declare as follows:

1. I am a partner in the law firm of Robbins Geller Rudman & Dowd LLP and counsel to lead plaintiff Stichting Philips Pensioenfond. I am duly licensed to practice before all courts of the State of California and admitted *pro hac vice* in this case. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached hereto are true and correct copies of the following documents in support of Plaintiffs' Motion for Class Certification, filed herewith:

Exhibit 4: Amended Certification of Lead Plaintiff Pursuant to Federal Securities Laws;

Exhibit 5: Excerpts from the deposition of Theo Kamps, the Federal Rule of Civil Procedure 30(b)(6) designee for Stichting Philips Pensioenfond, taken on January 11, 2012 (unofficial transcript) [submitted for filing under seal];

Exhibit 6: Excerpts from the deposition of Mary K. Jones, taken on December 15, 2011, (unofficial transcript) [submitted for filing under seal];

Exhibit 7: Mary K. Jones Revocable Trust Agreement, dated August 28, 1997 [submitted for filing under seal]; and

Exhibit 8: Plaintiff's Certification of Investment of Pfizer.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed January 13, 2012, at San Francisco, California.

s/ Willow R. Radcliffe

WILLOW E. RADCLIFFE

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 13, 2012.

s/ Willow E. Radcliffe

WILLOW E. RADCLIFFE

ROBBINS GELLER RUDMAN
& DOWD LLP
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
E-mail: willowr@rgrdlaw.com

Mailing Information for a Case 1:10-cv-03864-AKH

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Charles Alan Gilman**
cgilman@cahill.com
- **James M. Hughes**
jhughes@motleyrice.com,erichards@motleyrice.com,kweil@motleyrice.com
- **David George Januszewski**
djanuszewski@cahill.com
- **Joe Kendall**
administrator@kendalllawgroup.com,jkendall@kendalllawgroup.com,hindley@kendalllawgroup.com
- **Leigh R. Lasky**
lasky@laskyrifkind.com
- **Hamilton Philip Lindley**
hlindley@goldfarbbranham.com
- **Ryan A. Llorens**
ryanl@rgrdlaw.com
- **Matthew Melamed**
mmelamed@rgrdlaw.com
- **Donald Alan Migliori**
dmigliori@motleyrice.com
- **Danielle S. Myers**
dmyers@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **William H. Narwold**
bnarwold@motleyrice.com,imoll@motleyrice.com,vlepine@motleyrice.com,ajanelle@motleyrice.com
- **Willow E. Radcliffe**
willowr@rgrdlaw.com
- **Joseph F. Rice**
jrice@motleyrice.com
- **Darren J. Robbins**
e_file_sd@rgrdlaw.com
- **Henry Rosen**
henryr@rgrdlaw.com,dianah@rgrdlaw.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com,danim@rgrdlaw.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com

- **Trig Randall Smith**
trigs@rgrdlaw.com,e_file_sd@rgrdlaw.com,nhorstman@rgrdlaw.com
- **Mitchell M.Z. Twersky**
mtwersky@aftlaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Catherine J. Kowalewski

Robbins Geller Rudman & Dowd LLP (San Diego)
655 West Broadway
Suite 1900
San Diego, CA 92101

David C. Walton

Lerach, Coughlin, Stoia, Geller, Rudman & Robbins, L.L.P.
655 W. Broadway
Suite 1900
San Diego, CA 92101-3301